

FILED

AUG - 8 2014

United States District Court

CLERK, U.S. DISTRICT COURT NORTHERN

DISTRICT OF TEXAS

By

UNITED STATES OF AMERICA

V.

COMPLAINT

JESUS PARAMO

CASE NUMBER: 3-14-MJ-

594.BH

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about November 5, 2013, in the Dallas Division of the Northern District of Texas, defendant(s) did,


knowingly transport or ship child pornography using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer,

in violation of Title 18, United States Code, Section(s) 2252A(a)(1).

I further state that I am a(n) Special Agent with U.S. Homeland Security Investigations (HSI) and that this complaint is based on the following facts:

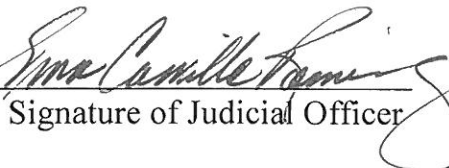
See attached Affidavit of Special Agent Robert M. Jester, (HSI) which is incorporated and made a part hereof by reference.

Continued on the attached sheet and made a part hereof: XX Yes No

 8/8/14
Signature of Complainant
ROBERT M. JESTER
Special Agent, (HSI)

Sworn to before me and subscribed in my presence, on this 8th day of August, 2014, at Dallas, Texas.

IRMA C. RAMIREZ
UNITED STATES MAGISTRATE JUDGE
Name & Title of Judicial Officer


Signature of Judicial Officer

AFFIDAVIT

I, Robert M. Jester, being duly sworn, declared and state as follows:

INTRODUCTION

1. I am a Special Agent with the United States Department of Homeland Security Investigations (HSI), assigned to the Special Agent in Charge, Dallas, Texas. I have been employed with HSI and its predecessor organization, the Immigration and Naturalization Service (INS), since June 1994. As part of my duties as an HSI agent, I investigate criminal violations relating to child exploitation and child pornography, including violations pertaining to the illegal production, distribution, receipt, and possession of child pornography, in violation of 18 U.S.C. §§ 2251, 2252 and 2252A. I have received training in the area of child pornography and child exploitation, and, during investigations, have observed and reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media, including computer media. I have been involved in numerous child pornography investigations and am very familiar with the tactics used by child pornography offenders who collect and distribute child pornographic material.

2. This affidavit sets forth facts and suggests reasonable inferences from those facts, establishing that there is probable cause to believe that on or about November 5, 2013, in the Northern District of Texas, Jesus PARAMO committed the offense of Transportation of Child Pornography, in violation of 18 U.S.C. § 2252A(a)(1).

3. The information contained in this affidavit is from Affiant's personal knowledge of the described investigation and from information obtained from other law enforcement agents.

OVERVIEW OF INVESTIGATION

4. In November and December of 2013, Detective Chris Quigley of the Mesquite, Texas Police Department was conducting investigations of the sharing of child pornography files on the ARES P2P file sharing network. Between November 5 and December 3, 2013, Detective Quigley successfully downloaded the following files that the computer at IP address 76.186.86.159 was making available:

File Name	File Description
no cuzinho da novinha amarrada.mpg	This 1 minute, 29 second video depicts a prepubescent female child who is bound with her legs in the air. An adult male is seen having vaginal and anal sexual intercourse with the child. She appears to be between 4 and 9 years of age.
pthc - fucking my little cousin - sdpa - prima cogida primita.mpeg	This 53 second video depicts a prepubescent female, 7 to 10 years of age, lying on her back on a bed wearing a "French maid" costume. The skirt of the costume is pulled up exposing her vagina. An adult male is rubbing his erect penis on the female's vagina before beginning to masturbate himself.

5 . On January 28, 2014, Affiant sent an administrative summons to Time Warner Cable to produce subscriber information for the IP address 76.186.86.159 that was logged on November 05, 2013 from 2:18 am CDT until 2:58 am CDT and on

December 03, 2013 from 3:24 am CDT until 3:40 am CDT, which were the dates and times of the downloads.

6. On February 07, 2014, Time Warner Cable responded to the summons. The subscriber using IP address 76.186.86.159 on the specified dates and times was W.C. at the address 3222 Point East Drive, Mesquite, Texas 75150.

7. On February 27, 2014, HSI Dallas Special Agents executed a federal search warrant at W.C.'s residence, assisted by Detective Quigley. Agents searched the residence in accordance with the search warrant but did not find evidence of child pornography on any of the computers. There was also no evidence found of file sharing programs having been installed on any of the computers.

8. Agents confirmed that the wireless router was not password protected. Furthermore, W.C.'s router was accessible from as far away as two or three residences in all directions. Agents surmised that someone else could possibly be using W.C.'s internet service to gain access to the internet and trade child pornography files via file sharing networks.

9. From March 03 through March 06, 2014, a computer application known as WireShark was utilized by agents at W.C.'s residence. The application is designed to capture the unique identifiers of wireless devices that access the internet via W.C.'s router. These identifiers, called MAC addresses (media access control addresses), are assigned by the manufacturer of any Internet interface device, such as a computer, tablet or smart phone. The MAC address is unique to each device and does not

change.

10. The Wireshark application captured a MAC address, f8768c0588e9, that was not assigned to any of the devices used by W.C. Detective Quigley then utilized an electronic device to target that specific MAC address and follow its signal strength. The device is called Shadow, manufactured by SRT Wireless Technologies. SRT's Shadow is a small, consumer product (NOKIA N810) modified to provide 802.11 surveys and direction finding capability for investigative deployment scenarios. Shadow monitors, analyzes, and presents the operator with calculated signal levels of the targeted device to determine a relative proximity to the identified station.

11. The signal strength clearly indicated that the MAC address originated from a residence directly behind W.C.'s residence at 3412 Park Run Drive, Mesquite, Texas 75150. Further investigation revealed that the owner of 3412 Park Run Drive, Jesus PARAMO, had used W.C.'s IP address many times to log onto his email accounts.

12. Based on the foregoing information, HSI Special Agents were able to secure a federal search warrant for the premises. On August 7, 2014, HSI Agents executed the search warrant at 3412 Park Run Drive, Mesquite, Texas 75150. HSI Agents observed evidence of child pornography while conducting a preliminary search of Jesus PARAMO's Lenova IdeaPad Computer, Serial number CB0688790. Three child pornography video files captured during the preliminary search of the Lenova computer include the following:


File Name	File Description
(hussyfan) perfecta emision252.mpeg	This 23-minute, 33-second video depicts a prepubescent girl, age 9-11, lying completely nude on a bed. She is shown performing oral sex on an adult male.
(sdpa) nino de 10 anos cojiendo a nina de 14.avi	This 8-minute, 41-second video depicts a prepubescent boy, age 8-10, and a pubescent girl, age 12-14, lying completely nude on a bed. The boy is shown lying on top of the girl as his penis penetrates the girl's vagina.
Chavita de secundaria cojiendo	This 5-minute, 36-second video depicts a prepubescent girl, age 8-10, lying completely nude on a bed. An adult male is penetrating the girl's vagina with his penis.

13. Affiant informed Jesus PARAMO that he was free to leave at any time and that he did not have to answer questions from Affiant. PARAMO agreed to speak with Affiant and answer questions about his involvement in downloading and possessing images of child pornography. During the interview, PARAMO fully confessed to utilizing the Ares P2P file-sharing network to view and download images of child pornography. PARAMO admitted that he understood how file-sharing worked and knew that the images and videos he downloaded were available to share to others using Ares. PARAMO said that he had been downloading child pornography from the Internet for 5-6 years.

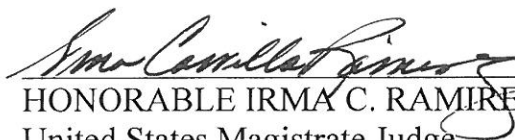
CONCLUSION

14. Based on the foregoing facts and circumstances, I respectfully submit

that there is probable cause to believe that on or about November 5, 2013, in the Northern District of Texas, Jesus PARAMO committed the offense of Transportation of Child Pornography, in violation of 18 U.S.C. § 2252A(a)(1).

 8/8/14
Robert M. Jester
Special Agent
Department of Homeland Security Investigations

Subscribed and sworn before me this 8th day of August, 2014.


HONORABLE IRMA C. RAMIREZ
United States Magistrate Judge
Northern District of Texas